

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GERALD E. GROFF,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION NO.
	:	19-CV-1879
	:	
LOUIS DEJOY	:	
POSTMASTER GENERAL,	:	
UNITED STATES	:	
POSTAL SERVICE,	:	
	:	
Defendant.	:	

MOTION FOR *PRO HAC VICE* ADMISSION FOR SCOTT M. NELSON

1. Plaintiff expanded his legal team since returning to the district court on remand from the United States Supreme Court and in preparation for trial after summary-judgment proceedings.
2. In the interest of continuity of representation, Plaintiff wishes to keep his legal counsel in preparation for trial but supplement his current team with additional counsel.
3. Scott Nelson is a trial partner with Baker Botts, L.L.P., which served as lead counsel in Plaintiff's appellate advocacy, including at the U.S. Supreme Court. Plaintiff would like Baker Botts and its team to coordinate trial preparation and operate as lead counsel for trial, aside other counsel of record.
4. Scott Nelson is licensed in Texas (ID: 00797145), and he is admitted in the United States Supreme Court, Fifth Circuit, Sixth Circuit, and Seventh Circuit, the Central

District of Illinois, as well as the Northern, Eastern, Western, and Southern Districts of Texas.

5. Additionally, Mr. Nelson is particularly qualified for this case because of his experience in employment litigation and leading the trial of various employment-related cases.
6. All other necessary forms are being filed contemporaneously, along with the \$75 filing fee.

WHEREFORE, Plaintiff respectfully requests that this Court grant admission *pro hac vice* for Scott Nelson, Esquire.

Respectfully submitted,

/s/ Joel A. Ready, Esq.
Joel A. Ready, Esq.
Cornerstone Law Firm
8500 Allentown Pike, Suite 3
Blandon, PA 19510
Counsel for Plaintiff

Dated: March 6, 2025